

# EXHIBIT A

IN THE UNITED STATES DISTRICT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

\* \* \*

LISA BARBOUNIS, : CIVIL ACTION - LAW  
Plaintiff :  
: :  
vs : :  
: :  
MIDDLE EASTERN FORUM, : :  
et al., : :  
Defendants : NO. 2:19-cv-05030

\* \* \*

Videotaped deposition of MARC FINK, via  
video conference, taken on Tuesday, November 24, 2020,  
beginning at 3:03 p.m. before Pamela Pratt, via video  
conference, Court Reporter and Notary Public in and for  
the Commonwealth of Pennsylvania.

\* \* \*

## APPEARANCES:

SETH D. CARSON, ESQUIRE  
(Via video conference)  
DEREK SMITH LAW GROUP, PLLC  
1835 Market Street, Suite 2950  
Philadelphia, Pennsylvania 19103  
(215)391-4790  
seth@dereksmithlaw.com

-- Representing the Plaintiff

JONATHAN R. CAVALIER, ESQUIRE  
DAVID J. WALTON, ESQUIRE  
(Via video conference)  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street  
Philadelphia, Pennsylvania 19103  
(215)665-2000  
dwalton@cozen.com

-- Representing the Defendant  
Middle Eastern Forum

SIDNEY L. GOLD, ESQUIRE  
WILLIAM RIESER, ESQUIRE  
(Via video conference)  
SIDNEY L. GOLD & ASSOCIATES, P.C.  
Eleven Penn Center, Suite 515  
1835 Market Street  
Philadelphia, Pennsylvania 19103  
(215)569-1999  
sgold@discrimlaw.net

-- Representing the Defendant Gregg Roman

## ALSO PRESENT:

Mike Gannone - Videographer  
Steven Levy  
Gregg Roman  
Daniel Pipes

11 Q. Can you, kind of, just briefly describe the  
12 roles you have with Middle East Forum?

<sup>18</sup> Q. Victims of what?

19 A. Lawfare.

20 Q. Lawfare. What's lawfare?

21 A. The offensive use of legal action to harass  
22 or bankrupt people.